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April 7, 2025

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BY ECF

The Honorable Margaret M. Garnett
United States District Judge
40 Foley Square, Room 2102
New York, NY 10007

Re: *Pospisil, et al. v. ATP Tour, Inc., et al.*, No. 1:25-cv-02207-MMG (S.D.N.Y.)

Dear Judge Garnett:

We represent Defendant ATP Tour, Inc. in the above-captioned action. We write on behalf of all Defendants to request (i) extensions of Defendants' time to answer, move, or otherwise respond to the Complaint, and (ii) commensurate extensions of time for any dates that may be affected by this extension request, as set forth below.

Defendants all agree that a consolidated date to respond to the Complaint would be efficient for all and for the Court.¹ Specifically, Defendants seek this extension so that Defendants have sufficient time to analyze the 163-page complaint and attempt to minimize duplication across responses. Plaintiffs consent to this request. No party has made any prior requests for an extension of time.

Specifically, Defendants propose that:

1. Defendants' time to answer, move, or otherwise respond to the Complaint is extended through and including May 20, 2025.
2. If any Defendant makes a motion in response to the Complaint, Plaintiffs' deadline to file a memorandum of law in opposition is on or before July 22, 2025.
3. Defendants' deadline to file a memorandum of law in reply is on or before August 21, 2025.

¹ Defendant ATP Tour, Inc.'s current deadline is April 9, 2025. Defendant WTA Tour, Inc.'s current deadline is April 10, 2025. The International Tennis Federation Ltd. and International Tennis Integrity Agency Ltd.'s current deadlines are April 11, 2025.



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Defendants hereby waive any objections with respect to the sufficiency of service of the Complaint, but otherwise expressly preserve all other defenses or objections, including those based on lack of jurisdiction.

Respectfully submitted,

/s/ Bradley I. Ruskin
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Counsel for Defendant ATP Tour, Inc.

cc: All counsel of record

Application GRANTED. Defendants shall answer, move, or otherwise respond to the Complaint no later than **May 20, 2025**. Should Defendants move in response to the Complaint, Plaintiffs shall file any opposition to the motion no later than **July 22, 2025**, and Defendants shall file any reply in support of their motion no later than **August 21, 2025**. The Clerk of Court is respectfully directed to terminate Dkt. No. 51.

SO ORDERED. Date: 4/8/2025.

A handwritten signature in black ink, appearing to read "Margaret M. Garnett", written over the typed name and title.

HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE